

REMARKS

In the Office Action mailed June 13, 2008, (hereinafter, "Office Action"), the Examiner rejected claims 16-31 under 35 U.S.C. § 102(a) as being anticipated by U.S. Patent No. 6,664,978 to Kekic et al. (hereinafter, "Kekic").

Claims 1-15 were previously canceled. Accordingly, claims 16-31 are currently pending. Based on the following remarks, Applicants respectfully traverse the rejection under 35 U.S.C. § 102(a), and request timely allowance of pending claims 16-31.

I. Rejection under 35 U.S.C. § 102(a)

Applicants respectfully traverse the rejection of claims 16-31 under 35 U.S.C. § 102(a) as being anticipated by Kekic. A proper anticipation rejection requires that "each and every element set forth in the claim be found, either expressly or inherently described, in a single prior art reference." M.P.E.P. § 2131. In addition, "[t]he elements must be arranged as required by the claim" Id. (emphasis added). Applicants respectfully submit that Kekic fails to disclose all of the subject matter recited in each of the independent claims, and also fails to disclose the elements as arranged by each of independent claims 16, 17, and 18.

Specifically, Kekic fails to disclose, *inter alia*, a combination including the step of "creating a run-time data structure, . . . [and] storing the run-time data structure in a storage area that relates to the controller," as recited in independent claim 16.

While the Examiner attempts to draw a correspondence between Kekic's Model-View-Controller design pattern and Applicants' claim recitations, the Examiner is incorrect. Instead of disclosing "creating a run-time data structure . . . ," as required by claim 16, Kekic discloses that "[t]he structure of [his] invention is based on the Model-

View-Control (MVC) design pattern that is used in almost every GUI class library.” Id. at 55:28-30. In Kekic, “[t]he controller object is responsible for **creating the screen part object [i.e., view object]**, controlling the contents of the [view] object, interacting with target objects [i.e., model objects] on the behalf of the [view] object, and for processing of the [view] object’s custom events.” Id. at 55:64-56:2 (emphasis added); See id. at 55:37-39. Kekic does not disclose “creating a run-time data structure . . . , as recited in independent claim 16.

Moreover, the Examiner mischaracterizes the teachings of Kekic, alleging that “. . . run time information . . . stored . . . ” corresponds to the claim 16 recitation of “storing the run-time data structure in a storage area that relates to the controller.” Office Action, p. 2. Not only is such a generalized allegation contrary to the requirements for a proper § 102 rejection, but it is also an unsupportable application of Kekic’s disclosure to the claim recitations.

Kekic does not disclose “storing the run-time data structure in a storage area that relates to the controller,” as recited in independent claim 16. Instead, Kekic makes a distinction between “the manager” and “the element managers,” and assigns the run-time responsibilities to the manager. For example, Kekic states that “[t]he manager provides the run-time environment in which the element managers are executed” Kekic, 6:43-44. According to Kekic, “the **separation** between the visual element manager and the manager is seamless and transparent to the user.” Id. at 6:47-49 (emphasis added). Thus, while Kekic may arguably disclose that “run time information such as . . . [a] polled value is stored as a string object . . . ” (76:18-20), such a

disclosure does not correspond to Applicants' claim 16 recitation of "storing the run-time data structure in a storage area that relates to the controller."

Accordingly, for at least the above-outlined reasons, Kekic fails to disclose all of the subject matter recited in Applicants' independent claim 16. Therefore, the rejection of independent claim 16 under 35 U.S.C. § 102(a) is legally deficient, should be withdrawn, and the claim allowed.

Independent claims 17 and 18, although of different scope, recite elements similar to that of independent claim 16, and are therefore allowable for at least the same reasons. Therefore, the rejection of independent claims 17 and 18 under 35 U.S.C. § 102(a) is legally deficient, should be withdrawn, and the claims allowed.

Claims 19-31 depend from independent claim 18. As discussed above, Kekic does not support a rejection of independent claim 18 under § 102. Therefore, dependent claims 19-31 are allowable for at least the same reasons as set forth above in connection with independent claim 18.

II. Conclusion

In view of the foregoing amendments and remarks, Applicants respectfully request reconsideration and reexamination of this application and the timely allowance of the pending claims.

The Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicants decline to automatically subscribe to any statement or characterization in the Office Action.

Please grant any extensions of time required to enter this response and charge any additional required fees to Deposit Account No. 06-0916.

Respectfully submitted,

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